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Board of Registration in Pharmacy

Policy 2020-15: Licensee Scope of Practice

The Massachusetts Board of Registration in Pharmacy ("Board") issues this policy regarding licensee scope of practice. The American Pharmacists Association ("APhA") describes "scope of practice" as the boundaries within which a health professional may practice. The purpose of this policy is to outline practice requirements and permitted professional duties by pharmacists, pharmacy interns, and pharmacy technicians. This policy is not intended be an exhaustive list of all professional activities. Please contact the Board for any scope of practice questions that fall outside this policy.

I. Pharmacist / Intern

As outlined by APhA, **pharmacists** may provide a broad spectrum of services that include but are not limited to managing chronic diseases, performing medication management, administering immunizations, and working in and partnering with health care providers to advance health and wellness. Pharmacists practicing in different settings may have other factors to consider.

Except for final prescription verification, a **pharmacy intern** may perform the same activities as a pharmacist as long as they are under the direct supervision of a licensed pharmacist.

Collaborative Drug Therapy Management ("CDTM"): In order for a pharmacist to order drug-related laboratory tests and prescribe medications, a CDTM agreement with a physician is required. Only pharmacists in an authorized practice setting may enter into a CDTM agreement. Please see links below for CDTM requirements and scope of practice details:

<https://www.mass.gov/doc/247-cmr-16-collaborative-drug-therapy-management/download>

<https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXVI/Chapter112/Section24B1~2>

Independent Practice: Pharmacists practicing independently (without an employee / employer relationship with a pharmacy) may not order or possess drugs without a Massachusetts Controlled Substances Registration (“MCSR”) and may not prescribe or direct prescriptions to certain pharmacies. An independently practicing pharmacist may perform compliance packaging services for patients. Sorting a patient’s oral medications within their home from prescription vials into a dose planner is not considered “redispensing.” These pharmacists should obtain informed patient consent before providing services and maintain policies and procedures for their services.

A. Testing

1. Health Promotion Screening:

A pharmacist and pharmacy intern may administer, process, read, and report the results of Health Promotion Screening tests, however only a pharmacist engaged in a CDTM agreement may initiate, modify, or discontinue drug therapy based on the results of these tests. For more information on Health Promotion Screening contact the DPH Clinical Laboratory Program:

<https://www.mass.gov/how-to/apply-for-approval-of-health-promotion-screening-laboratory-testing>

2. COVID-19:

A pharmacist and pharmacy intern may order, administer, process, read, and report results of COVID-19 tests but may not interpret any test results, diagnose, or initiate drug therapy based on the results of the tests. See the [Board’s policy on testing](#) for details.

B. Telepharmacy

In Massachusetts, the scope of telepharmacy is limited to remote pharmacist clinical activities and verification of final patient-specific products. Please review requirements as outlined in [Policy 2021-02: Shared Pharmacy Service Models Including Central Fill, Remote Processing, and Telepharmacy](#).

1. Unless provided in conjunction with a prescription filled in a non–resident pharmacy, each non-resident pharmacist must maintain a Massachusetts license in order to provide cognitive services to a Massachusetts patient.
2. The practice of having a pharmacy technician fill and dispense a prescription without a pharmacist on site is not currently permitted within Massachusetts.

C. Immunizations / Injections

1. Massachusetts regulations and policies dictate which medications a pharmacist is permitted to administer. After completing the requisite training, pharmacists and interns may only administer:
 - a. vaccines and medications to manage adverse events in accordance with the [Board's vaccination policy](#);
 - b. medications for the treatment of mental illness and substance use disorder as specified in the [Circular Letter](#);
 - c. EVUSHELD™ and FDA-authorized, FDA-licensed, and investigational COVID-19 vaccines may be administered in accordance with [Board policy](#);
 - d. FDA-approved, authorized, cleared, or licensed COVID-19 therapeutics may be ordered and either dispensed or administered in accordance with Board [Policy 2022-06: COVID-19 Therapeutics](#).
2. Board-licensed pharmacies may conduct off-site immunization clinics utilizing qualified pharmacy personnel as long as a Massachusetts-licensed pharmacist is present.
3. At this time, pharmacists may not administer any other medications or perform skin testing.

D. Veterinary Drugs

1. Pharmacists are prohibited by federal law to recommend a human OTC drug for an animal. Any such use must be pursuant to a prescription or documentation from a veterinarian.
2. Pharmacists may compound Schedule VI emergency medications for [veterinary office use](#) in accordance with Board policy.

II. Pharmacy Technician

- A. Under the supervision of a pharmacist, **all licensed pharmacy technicians (including pharmacy technician trainees who must be under direct pharmacist supervision, unless otherwise noted)** may:
 1. enter prescription data into a computerized pharmacy system;
 2. take stock bottles from the shelf to fill prescriptions for Schedules III through VI medications;
 3. affix label to a prescription container;
 4. reconstitute a medication;

5. prepare patient compliance packaging with Schedule III through VI medications;
6. compound sterile and non-sterile Schedule III through VI medications;
7. extend the offer to counsel;
8. assist in the transport of filled and verified Schedule II through VI prescriptions or orders (e.g., delivering filled prescriptions from the pharmacy to a nurse, retrieving the medication from a pickup bin and ringing out the transaction at the register, etc.); and
9. stock and / or perform expiration date checking of Schedules III through VI medications in [automated dispensing devices](#).

Note: If performed within a Massachusetts-licensed health care facility (e.g., hospital) that has an on-site pharmacy, pharmacy technician trainees may perform this function without direct pharmacist supervision in accordance with Board policy: *Use of Pharmacy Technician Trainees to Stock Automated Dispensing Devices*.

B. Under the supervision of a pharmacist, **all licensed pharmacy technicians (EXCEPT pharmacy technician trainees)** may also:

1. request and accept orally transmitted REFILL authorizations for Schedule III through VI medications if there have not been any changes to the prescription;
2. conduct remote processing of prescriptions in accordance with the Board's [shared pharmacy services policy](#); and
3. perform certain activities during the COVID-19 emergency declaration. Qualified pharmacy technicians (as defined in [Board policy](#)) may:
 - a. prepare and administer COVID-19 and other vaccines in accordance with Board policies; and
 - b. administer and process COVID-19 tests.

C. Under the supervision of a pharmacist, **licensed pharmacy technicians that have national certification (CPhT or ExCPT)** may also:

1. use technology to verify certain [inventory management functions](#);
2. stock and / or perform expiration date checking of Schedule II medications in automated dispensing devices;
3. perform Schedule II perpetual inventory counts with a second licensed nationally certified technician provided that the supervising pharmacist verifies that the perpetual inventory has been completed in accordance with Board regulations;
4. may make entries into the Schedule II perpetual inventory;
5. accept NEW orally transmitted Schedule III through VI prescriptions;
6. perform prescription transfers between pharmacies for Schedule VI drugs;

7. assist in the HANDLING of Schedule II medications (e.g., counting pills, working in a vault, performing inventory related tasks, filling / checking automated dispensing devices, etc.) EXCEPT for any hydrocodone-only extended-release medication that is not in an abuse deterrent form; and
8. perform medication histories.

D. Pharmacy Technicians may not:

1. administer medications or vaccines, unless permitted by Board policy;
2. perform final patient dispensing process validation;
3. counsel patients;
4. perform a drug utilization review (“DUR”);
5. resolve clinical issues;
6. contact prescribers concerning drug therapy clarification or modification; or
7. compound, fill, and / or dispense prescriptions without a pharmacist on site.

Please direct any questions to: Pharmacy.Admin@mass.gov

References:

APhA:

<https://pharmacist.com/Practice/Practice-Resources/Scope-of-Practice>

ACCP:

<https://www.accp.com/docs/govt/advocacy/Leadership%20for%20Medication%20Management%20-%20MTM%20101.pdf>

<https://www.accp.com/docs/positions/misc/scopeofpractice.pdf>

ASCP:

[https://cdn.ymaws.com/www.ascp.com/resource/collection/28D69F2D-18D9-4EF8-A086-](https://cdn.ymaws.com/www.ascp.com/resource/collection/28D69F2D-18D9-4EF8-A086-675AB7E4ECD8/Quality_Standards_and_Practice_Principles_for_Senior_Care_Pharmacists.pdf)

[675AB7E4ECD8/Quality Standards and Practice Principles for Senior Care Pharmacists.pdf](https://cdn.ymaws.com/www.ascp.com/resource/collection/28D69F2D-18D9-4EF8-A086-675AB7E4ECD8/Quality_Standards_and_Practice_Principles_for_Senior_Care_Pharmacists.pdf)

CDC:

<https://www.cdc.gov/dhds/pubs/guides/best-practices/pharmacist-mtm.htm>

Pharmacy Times:

<https://www.pharmacytimes.com/publications/issue/2018/december2018/you-cannot-beat-a-healthy-heart-how-brown-bagging-can-bring-clarity>

<https://www.pharmacytimes.com/publications/directions-in-pharmacy/2015/august2015/compliance-packaging-one-way-to-help-the-medicine-go-down>

NABP:

https://nabp.pharmacy/wp-content/uploads/2018/04/White-Bagging-and-Brown-Bagging-Report-2018_Final.pdf